

Joseph R. Donahue, Esq.
 LAW OFFICES OF JOSEPH R. DONAHUE
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 Attorneys for Hee Ah Nam

UNITED STATES OF AMERICA,	:	UNITED STATES DISTRICT COURT
	:	DISTRICT OF NEW JERSEY
v.	:	
	:	
THE CONTENTS OF THE FOLLOWING	:	Civil Action No.: 24-05863-MEF-MAH
ACCOUNTS:	:	
	:	
JP MORGAN CHASE ACCOUNT	:	ANSWER AND DEFENSES OF
ENDING IN 9483 IN THE NAME OF JAE	:	CLAIMANT HEE AH NAM
CHOI ATTORNEY TRUST ACCOUNT, ET	:	
AL.	:	
<i>Defendants in rem.</i>	:	
	:	
And concerning,	:	
	:	
HEE AH NAM,	:	
	:	
<i>Claimant.</i>	:	

Claimant Hee Ah Nam, of 206 Grant Avenue, Cliffside Park, New Jersey, through her attorney Joseph R. Donahue, Esq., by way of Answer to the Complaint of the United States of America, states:

I. NATURE OF THE ACTION

1. Claimant admits to the allegations contained in Paragraph One of the Plaintiff's Complaint.
2. Claimant denies the allegations contained in Paragraph Two of the Plaintiff's Complaint.

3. Claimant denies the allegations contained in Paragraph Three of the Plaintiff's Complaint.

II. JURISDICTION AND VENUE

4. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Four of the Plaintiff's Complaint.

5. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Five of the Plaintiff's Complaint.

6. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Six of the Plaintiff's Complaint.

7. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Seven of the Plaintiff's Complaint.

III. FACTS

8. i. Claimant admits to the allegations set forth in Paragraph Eight i of Plaintiff's Complaint;

ii. Claimant admits to the allegations set forth in Paragraph Eight ii of Plaintiff's Complaint.

iii. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Eight iii of the Plaintiff's Complaint.

iv. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Eight iv of Plaintiff's Complaint.

v. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Eight v of Plaintiff's Complaint.

vi. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Eight vi of Plaintiff's Complaint.

vii. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Eight vii of Plaintiff's Complaint.

9. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Nine of the Plaintiff's Complaint.

A. Background of Covid-19 Loan Program.

10. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Ten of the Plaintiff's Complaint.

11. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Eleven of the Plaintiff's Complaint.

12. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Twelve of the Plaintiff's Complaint.

13. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Thirteen of the Plaintiff's Complaint.

B. Overview of the Scheme.

14. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Fourteen of the Plaintiff's Complaint.

15. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Fifteen of the Plaintiff's Complaint.

C. Falsified Smart Learning Application to First Home Bank.

16. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Sixteen of the Plaintiff's Complaint.

17. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Seventeen of the Plaintiff's Complaint.

18. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Eighteen of the Plaintiff's Complaint.

19. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Nineteen of the Plaintiff's Complaint.

20. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Twenty of the Plaintiff's Complaint.

D. Falsified Homeschool Buyers Club Application to Hanmi Bank.

21. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Twenty-One of the Plaintiff's Complaint.

22. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Twenty-Two of the Plaintiff's Complaint.

23. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Twenty-Three of the Plaintiff's Complaint.

24. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Twenty-Four of the Plaintiff's Complaint.

E. Falsified Educloud Application to Cache Valley Bank.

25. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Twenty-Five of the Plaintiff's Complaint.

26. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Twenty-Six of the Plaintiff's Complaint.

27. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Twenty-Seven of the Plaintiff's Complaint.

28. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Twenty-Eight of the Plaintiff's Complaint.

F. Choi's Use of PPP Loan Proceeds.

29. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Twenty-Nine of the Plaintiff's Complaint.

G. Choi's Arrest and the Subsequent Criminal Proceedings.

30. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Thirty of the Plaintiff's Complaint.

31. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Thirty-One of the Plaintiff's Complaint.

32. Claimant admits to the allegations contained in Paragraph Thirty-Two of Plaintiff's Complaint.

IV. THE DEFENDANTS *IN REM*

A. The Accounts Used to Receive Proceeds of the Fraudulently Obtained PPP loans.

33. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Thirty-Three of the Plaintiff's Complaint.

34. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Thirty-Four of the Plaintiff's Complaint.

i. Homeschool Hanmi Acct 4248.

35. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Thirty-Five of the Plaintiff's Complaint.

36. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Thirty-Six of the Plaintiff's Complaint.

37. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Thirty-Seven of the Plaintiff's Complaint.

ii. Educloud PNC Acct 0867.

38. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Thirty-Eight of the Plaintiff's Complaint.

39. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Thirty-Nine of the Plaintiff's Complaint.

40. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Forty of the Plaintiff's Complaint.

iii. Smart Learning PNC Acct 1579.

41. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Forty-One of the Plaintiff's Complaint.

42. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Forty-Two of the Plaintiff's Complaint.

43. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Forty-Three of the Plaintiff's Complaint.

44. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Forty-Four of the Plaintiff's Complaint.

B. Tracing the Proceeds of the Fraudulently Obtained PPP Loans.

45. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Forty-Five of the Plaintiff's Complaint.

i. Overview of Money Movement.

46. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Forty-Six of the Plaintiff's Complaint.

47. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Forty-Seven of the Plaintiff's Complaint.

48. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Forty-Eight of the Plaintiff's Complaint.

49. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Forty-Nine of the Plaintiff's Complaint.

50. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Fifty of the Plaintiff's Complaint.

51. Claimant admits to having accounts in her name and to not being involved in the PPP Loan Scheme but is without knowledge or information sufficient to form a belief as to the truth of the balance of the allegations contained in Paragraph Fifty-One of the Plaintiff's Complaint.

52. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Fifty-Two of the Plaintiff's Complaint.

Choi's Wife Told Law Enforcement that She Did Not Control the Bank Accounts Held in Her Name and in the Name of Corporate Entities that Contained Proceeds of the PPP Loan Scheme.

53. Claimant admits to the allegations contained in Paragraph Fifty-Three of the Plaintiff's Complaint.

Choi Used Bank Accounts Held in the Name of His Wife and in the Names of Corporate Entities He Controlled to Launder the Proceeds of the PPP Loan Fraud Scheme.

54. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Fifty-Four of the Plaintiff's Complaint.

Choi's Attorney Trust Account.

55. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Fifty-Five of the Plaintiff's Complaint.

56. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Fifty-Six of the Plaintiff's Complaint.

57. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Fifty-Seven of the Plaintiff's Complaint.

58. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Fifty-Eight of the Plaintiff's Complaint.

59. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Fifty-Nine of the Plaintiff's Complaint.

ii. JCA Trust JPMC Acct 9483.

60. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Sixty of the Plaintiff's Complaint.

61. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Sixty-One of the Plaintiff's Complaint.

62. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Sixty-Two of the Plaintiff's Complaint.

63. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Sixty-Three of the Plaintiff's Complaint.

iii. Hee Ah Nam JPMC Acct 0711.

64. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Sixty-Four of the Plaintiff's Complaint.

65. Claimant admits that she did not conduct any large transactions but is without knowledge or information sufficient to form a belief as to the truth of the balance of the allegations contained in Paragraph Sixty-Five of the Plaintiff's Complaint.

66. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Sixty-Six of the Plaintiff's Complaint.

67. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Sixty-Seven of the Plaintiff's Complaint.

iv. Hee Ah Nam TD Acct 2483.

68. Claimant admits that she is the authorized signer on the account but is without knowledge or information sufficient to form a belief as to the truth of the balance of the allegations contained in Paragraph Sixty-Eight of the Plaintiff's Complaint.

69. Claimant admits the allegations contained in Paragraph Sixty-Nine of the Plaintiff's Complaint.

70. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Seventy of the Plaintiff's Complaint.

71. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Seventy-One of the Plaintiff's Complaint.

72. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Seventy-Two of the Plaintiff's Complaint.

v. Hee Ah Nam TD Acct 1237.

73. Claimant admits that she is the authorized signer on the account but is without knowledge or information sufficient to form a belief as to the truth of the balance of the allegations contained in Paragraph Seventy-Three of the Plaintiff's Complaint.

74. Claimant admits the allegations contained in Paragraph Seventy-Four of the Plaintiff's Complaint.

75. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Seventy-Five of the Plaintiff's Complaint.

76. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Seventy-Six of the Plaintiff's Complaint.

vi. Hee Ah Nam BofA Acct 6030.

77. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Seventy-Seven of the Plaintiff's Complaint.

78. Claimant admits to the allegations contained in Paragraph Seventy-Eight of the Plaintiff's Complaint.

79. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Seventy-Nine of the Plaintiff's Complaint.

80. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Eighty of the Plaintiff's Complaint.

81. Claimant without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Eighty-One of the Plaintiff's Complaint.

82. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Eighty-Two of the Plaintiff's Complaint.

83. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Eighty-Three of the Plaintiff's Complaint.

84. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Eighty-Four of the Plaintiff's Complaint.

vii. Hee Ah Nam BofA Acct 6043.

85. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Eighty-Five of the Plaintiff's Complaint.

86. Claimant admits to the truth of the allegations contained in Paragraph Eighty-Six of the Plaintiff's Complaint.

87. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Eighty-Seven of the Plaintiff's Complaint.

88. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Eighty-Eight of the Plaintiff's Complaint.

89. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Eighty-Nine of the Plaintiff's Complaint.

viii. Hudson JPMC Acct 9900.

90. Claimant admits that she is the authorized signer on the account but is without knowledge or information sufficient to form a belief as to the truth of the balance of the allegations contained in Paragraph Ninety of the Plaintiff's Complaint.

91. Claimant admits that she opened the Hudson JPMC Acct 9900 account at Choi's direction and did not conduct transactions related to it but is without knowledge or information sufficient to form a belief as to the truth of the balance of the allegations contained in Paragraph Ninety-One of the Plaintiff's Complaint.

92. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Ninety-Two of the Plaintiff's Complaint.

93. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Ninety-Three of the Plaintiff's Complaint.

94. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Ninety-Four of the Plaintiff's Complaint.

95. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Ninety-Five of the Plaintiff's Complaint.

96. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Ninety-Six of the Plaintiff's Complaint.

ix. Hudson JPMC Acct 4413.

97. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Ninety-Seven of the Plaintiff's Complaint.

98. Claimant admits that she opened the Hudson JPMC Acct 4413 account at Choi's direction and did not conduct transactions related to it but is without knowledge or information sufficient to form a belief as to the truth of the balance of the allegations contained in Paragraph Ninety-Eight of the Plaintiff's Complaint.

99. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph Ninety-Nine of the Plaintiff's Complaint.

100. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph One-Hundred of the Plaintiff's Complaint.

x. Virtua JPMC Acct 0353.

101. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph One-Hundred-One of the Plaintiff's Complaint.

102. Claimant admits that she has no knowledge about Virtua and did not conduct any large transactions in the account but is without knowledge or information sufficient to form a belief as to the truth of the balance of the allegations contained in Paragraph One-Hundred-Two of the Plaintiff's Complaint.

103. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph One-Hundred-Three of the Plaintiff's Complaint.

104. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph One-Hundred-Four of the Plaintiff's Complaint.

105. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph One-Hundred-Five of the Plaintiff's Complaint.

106. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph One-Hundred-Six of the Plaintiff's Complaint.

xi. Virtua JPMC Acct 4827.

107. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph One-Hundred-Seven of the Plaintiff's Complaint.

108. Claimant admits that she has no knowledge about Virtua and did not conduct any large transactions in the account but is without knowledge or information sufficient to form a belief as to the truth of the balance of the allegations contained in Paragraph One-Hundred-Eight of the Plaintiff's Complaint.

109. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph One-Hundred-Nine of the Plaintiff's Complaint.

110. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph One-Hundred-Ten of the Plaintiff's Complaint.

xii. Smart Learning BofA Acct 4685.

111. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph One-Hundred-Eleven of the Plaintiff's Complaint.

112. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph One-Hundred-Twelve of the Plaintiff's Complaint.

113. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph One-Hundred-Thirteen of the Plaintiff's Complaint.

114. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph One-Hundred-Fourteen of the Plaintiff's Complaint.

115. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph One-Hundred-Fifteen of the Plaintiff's Complaint.

xiii. Choi Laundered Funds Traceable to Proceeds of the PPP Fraud Scheme by Using them to Fund a Brokerage Account Held in His Wife's Name - Hee Ah Nam TDA Acct 2857.

116. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph One-Hundred-Sixteen of the Plaintiff's Complaint.

117. Claimant admits the allegations contained in Paragraph One-Hundred-Seventeen of the Plaintiff's Complaint.

118. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph One-Hundred-Eighteen of the Plaintiff's Complaint.

119. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph One-Hundred-Nineteen of the Plaintiff's Complaint.

120. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph One-Hundred-Twenty of the Plaintiff's Complaint.

C. Summary of Seizures from the Twelve Accounts.

121. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph One-Hundred-Twenty-One of the Plaintiff's Complaint.

D. Choi Acquired a \$970,000 Home in Cresskill, New Jersey Using Funds Traceable to Proceeds of the PPP Loan Scheme.

122. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph One-Hundred-Twenty-Two of the Plaintiff's Complaint.

123. Claimant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph One-Hundred-Twenty-Three of the Plaintiff's Complaint.

124. Claimant admits that she did not provide funds for the purchase of the Cresskill home but is without knowledge or information sufficient to form a belief as to the truth of the

balance of the allegations contained in Paragraph One-Hundred-Twenty-Four of the Plaintiff's Complaint.

V. FIRST CLAIM FOR FORFEITURE

125. Claimant incorporates by reference her responses from all of the previous paragraphs as if fully set forth at length herein.

126. Claimant denies the allegations contained in Paragraph One-Hundred-Twenty-Six of the Plaintiff's Complaint.

127. Claimant denies the allegations contained in Paragraph One-Hundred-Twenty-Seven of the Plaintiff's Complaint.

VI. SECOND CLAIM FOR FORFEITURE

128. Claimant incorporates by reference her responses from all of the previous paragraphs as if fully set forth at length herein.

129. Claimant denies the allegations contained in Paragraph One-Hundred-Twenty-Nine of the Plaintiff's Complaint.

130. Claimant denies the allegations contained in Paragraph One-Hundred-Thirty of the Plaintiff's Complaint.

WHEREFORE, Claimant demands that the Complaint be dismissed in its entirety, with prejudice, and that Claimant be awarded attorney's fees, costs of suit, and such other relief that the Court deems just and reasonable. Claimant is also seeking an order of this Court declaring that Ms. Nam's interest in the Cresskill property and the bank accounts listed above be turned over to Ms. Nam promptly.

AFFIRMATIVE DEFENSES

FIRST DEFENSE

Plaintiff has failed to state a claim upon which relief may be granted.

SECOND DEFENSE

Plaintiff is barred from recovery by the equitable doctrine of waiver.

THIRD DEFENSE

Plaintiff's claim is barred by the doctrine of equitable estoppel.

FOURTH DEFENSE

Plaintiff is barred from recovery because its claim, lacking merit and support, is frivolous. Claimant is entitled to recover attorney's fees and costs.

FIFTH DEFENSE

The Claimant is an Innocent Owner and Innocent Spouse.

SIXTH DEFENSE

Plaintiff is barred from recovery by the applicable statute of limitations.

SEVENTH DEFENSE

Any losses complained of here are the result of acts or omissions of the Plaintiff and not Claimant.

EIGHTH DEFENSE

To the extent that the Plaintiff has failed to mitigate some or all of its damages, Plaintiff is not entitled to relief.

NINTH DEFENSE

The Complaint is barred in whole or in part by the doctrine of laches.

TENTH DEFENSE

At all times and places mentioned in the Complaint, the Claimant violated no legal duty owing by Claimant to Plaintiff.

ELEVENTH DEFENSE

Plaintiff's damages were the result of economic and other conditions over which the Claimant had no control nor had a duty to control.

TWELFTH DEFENSE

The relief being sought by Plaintiff is barred, in whole or in part, by Plaintiff's own negligent and/or intentional misconduct.

THIRTEENTH DEFENSE

No action, omission, or conduct by Claimant has directly or proximately caused any damage to Plaintiff.

FOURTEENTH DEFENSE

Claimant reserves the right to amend her Answer and/or to assert additional defenses and/or to supplement, alter and/or change her Answer upon revelation of additional or more definite facts provided by any party to the instant lawsuit and/or any third party and/or from any other source during the course of further discovery.

CERTIFICATION PURSUANT TO L. CIV. R. 11.2

I certify that this matter is not the subject of any other action pending in any court, or of any pending arbitration or administrative proceeding; no other action, arbitration or administrative proceeding is contemplated to my knowledge; and I know of no other parties who should be joined in this action at this time.

LAW OFFICES OF JOSEPH R. DONAHUE

135 Prospect Street
Ridgewood, New Jersey 07450
(201) 488-7707
Attorneys for Claimant Hee Ah Nam

/s/ Joseph R. Donahue

By: _____
Joseph R. Donahue, Esq.

Dated: August 14, 2024

CERTIFICATION OF SERVICE

I certify that the within Answer was served on this date by electronic delivery upon all counsel of record via ECF filing.

LAW OFFICES OF JOSEPH R. DONAHUE

135 Prospect Street
Ridgewood, New Jersey 07450
(201) 488-7707
Attorneys for Claimant Hee Ah Nam

/s/ Joseph R. Donahue

By: _____
Joseph R. Donahue, Esq.

Dated: August 14, 2024